

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

**DECLARATION OF  
CHRISTOPHER D. PHAM**

FEDERAL INSURANCE COMPANY,  
an Indiana corporation, and ACE  
AMERICAN INSURANCE COMPANY,  
a Pennsylvania corporation,

Defendants.

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I, Christopher D. Pham, declare as follows:

1. I am an attorney at Fredrikson & Byron, P.A. and am one of the attorneys representing Defendants Federal Insurance Company and ACE American Insurance Company in this case (collectively referred to as “Federal”).

2. In my role as counsel for Federal, I worked with Federal employees to produce the repository rule files that are the subject of the Court’s June 4, 2019 Order.

3. FICO has been provided with the repository rule files (which contain the contents of the business rules) for every Federal application that used Blaze, except for the EZER application. Those applications include CSI Express, Decision Point, Automated Renewal Process, CUW, IRMA (Individual Rate Modification Application), TAPS (Texas Accident Prevention System), Premium Booking, Evolution, and ADAPT-ABL.

4. On November 19, 2019, Federal produced the business object model files in the JAVA source code format (i.e. human readable format) for all applications, except for ADAPT and EZER, because the source code for these two applications could not be located at that time.

5. The repository files for ADAPT presented technical issues but were extracted and produced on December 17, 2019. On the same day, I informed FICO's counsel that Federal's employees had determined that the EZER repository files could not be extracted and produced.

6. Attached as **Exhibit A** is a copy of a document Bates labeled FED017463\_0001-0066, which was produced in this litigation on January 28, 2019.

7. Attached as **Exhibit B** is a copy of FICO's Fourth Set of Requests for Production of Documents dated December 28, 2019.

8. Attached as **Exhibit C** is a copy of Federal's Response and Objections to FICO's Fourth Set of Requests for Production of Documents dated January 28, 2019.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: April 1, 2020

s/ Christopher D. Pham

Christopher D. Pham